

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>Oumou Staton</b>	:	
<b>A/K/A Oumou Thomas</b>	:	<b>Chapter 13</b>
<b>Debtors</b>	:	
	:	<b>Bankruptcy No. 17-11141 AMC</b>
<b>Oumou Staton</b>	:	
<b>A/K/A Oumou Thomas</b>	:	
<b>Movant</b>	:	
<b>v.</b>	:	
	:	
<b>Bank of America, N.A</b>	:	
<b>Respondent</b>	:	

**RESPONSE OF BANK OF AMERICA, N.A TO MOTION TO RECONSIDER ORDER  
MODIFYING AUTOMATIC STAY**

Respondent, Bank of America, N.A by and through its attorneys, Phelan Hallinan  
Diamond & Jones, LLP, hereby responds to Motion to Reconsider Order Modifying Automatic  
Stay and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted only that if funds are tendered that are insufficient to completely cure the arrearage, they will be returned.
8. No Response necessary.
9. The amount need to cure thru February 2018 is \$3,234.00

**WHEREFORE**, Respondent, Bank of America, N.A. respectfully requests that this Honorable Court deny Motion to Reconsider Order Modifying Automatic Stay in its entirety.

Respectfully submitted,

Date: March 5, 2018

/s/ Jerome Blank, Esquire  
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